

FILED

SEP 15 2022

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

) INDICTMENT

Plaintiff,

)

5 :22 CR 521

v.

) CASE NO.

DONTEZE CONGRESS,
THOMAS J.D. WILLIAMS,

Title 18, United States Code,
Sections 2119(1), 924(c)(1)(A)(i),
(ii), and 2

Defendants.

JUDGE GWIN

COUNT 1

(Carjacking, 18 U.S.C. § 2119(1) and 18 U.S.C. § 2)

The Grand Jury charges:

1. On or about August 9, 2022, in the Northern District of Ohio, Eastern Division, Defendants DONTEZE CONGRESS and THOMAS J.D. WILLIAMS, and others known and unknown to the grand jury, did take a motor vehicle, to wit: a 2014 Jeep Cherokee bearing Ohio registration HZS8104, that had been transported, shipped, and received in interstate and foreign commerce, from M.S., a person known to the grand jury, by force, violence, and intimidation, with the intent to cause death and serious bodily harm, in violation of Title 18, United States Code, Section 2119(1) and Title 18, United States Code, Section 2.

COUNT 2

(Carrying a Firearm During and in Relation to a Crime of Violence,
18 U.S.C. § 924(c)(1)(A)(i))

The Grand Jury further charges:

2. On or about August 9, 2022, in the Northern District of Ohio, Eastern Division, Defendant DONTEZE CONGRESS did knowingly carry a firearm, to wit: a pistol, during and in

relation to a crime of violence which may be prosecuted in a court of the United States, to wit: Carjacking, a violation of Title 18, Section 2119(1), United States Code, as charged in Count 1 of the indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 3

(Possession of a Firearm in Furtherance of a Crime of Violence, 18 U.S.C. § 924(c)(1)(A)(i))

The Grand Jury further charges:

3. On or about August 9, 2022, in the Northern District of Ohio, Eastern Division, Defendant THOMAS J.D. WILLIAMS did knowingly possess a firearm, to wit: a semiautomatic rifle, in furtherance of a crime of violence for which he may be prosecuted in a court of the United States, to wit: Carjacking, charged in Count 1, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 4

(Aiding and Abetting Possession of a Firearm in Furtherance of a Crime of Violence, 18 U.S.C. §§ 924(c)(1)(A)(ii) and 2)

The Grand Jury further charges:

4. On or about August 9, 2022, in the Northern District of Ohio, Eastern Division, Defendant DONTEZE CONGRESS did knowingly aid and abet another to possess and brandish a firearm, to wit: a pistol, in furtherance of a crime of violence for which he may be prosecuted in a court of the United States, to wit: Carjacking, charged in Count 1, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT 5

(Aiding and Abetting Possession of a Firearm in Furtherance of a Crime of Violence, 18 U.S.C. §§ 924(c)(1)(A)(ii) and 2)

The Grand Jury further charges:

5. On or about August 9, 2022, in the Northern District of Ohio, Eastern Division, Defendant THOMAS J.D. WILLIAMS did knowingly aid and abet another to possess and

brandish a firearm, to wit: a pistol, in furtherance of a crime of violence for which he may be prosecuted in a court of the United States, to wit: Carjacking, charged in Count 1, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT 6

(Attempted Carjacking, 18 U.S.C. §§ 2119(1) and 18 U.S.C. § 2)

The Grand Jury further charges:

6. On or about August 9, 2022, in the Northern District of Ohio, Eastern Division, Defendant DONTEZE CONGRESS, and others known and unknown to the grand jury, did attempt to take a motor vehicle, to wit: a 2020 Jeep Cherokee bearing Ohio registration HZE5546, that had been transported, shipped, and received in interstate and foreign commerce, from J.S., a person known to the grand jury, by force, violence, and intimidation, with the intent to cause death and serious bodily harm, in violation of Title 18, United States Code, Section 2119(1) and Title 18, United States Code, Section 2.

COUNT 7

(Possession of a Firearm in Furtherance of a Crime of Violence, 18 U.S.C. § 924(c)(1)(A)(ii))

The Grand Jury further charges:

7. On or about August 9, 2022, in the Northern District of Ohio, Eastern Division, Defendant DONTEZE CONGRESS did knowingly possess and brandish a firearm, to wit: a pistol, in furtherance of a crime of violence for which he may be prosecuted in a court of the United States, to wit: Attempted Carjacking, charged in Count 6, in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT 8

(Carjacking, 18 U.S.C. § 2119(1) and 18 U.S.C. § 2)

The Grand Jury further charges:

8. On or about August 9, 2022, in the Northern District of Ohio, Eastern Division, Defendants DONTEZE CONGRESS and THOMAS J.D. WILLIAMS, and others known and unknown to the grand jury, did take a motor vehicle, specifically a 2020 Volvo S90 bearing Ohio registration JAF6656, that had been transported, shipped, and received in interstate and foreign commerce, from J.S., a person known to the grand jury, by force, violence, and intimidation, with the intent to cause death and serious bodily harm, in violation of Title 18, United States Code, Section 2119(1) and Title 18, United States Code, Section 2.

COUNT 9

(Possession of a Firearm in Furtherance of a Crime of Violence, 18 U.S.C. § 924(c)(1)(A)(ii))

The Grand Jury further charges:

9. On or about August 9, 2022, in the Northern District of Ohio, Eastern Division, Defendant DONTEZE CONGRESS did knowingly possess and brandish a firearm, to wit: a pistol, in furtherance of a crime of violence for which they may be prosecuted in a court of the United States, to wit: Carjacking, charged in Count 8, in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT 10

(Possession of a Firearm in Furtherance of a Crime of Violence, 18 U.S.C. § 924(c)(1)(A)(ii))

The Grand Jury further charges:

10. On or about August 9, 2022, in the Northern District of Ohio, Eastern Division, Defendant THOMAS J.D. WILLIAMS did knowingly possess and brandish a firearm, to wit: a pistol, in furtherance of a crime of violence for which they may be prosecuted in a court of the

United States, to wit: Carjacking, charged in Count 8, in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

FORFEITURE

The Grand Jury further charges:

11. For the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), the allegations of Counts 1 through 10 are incorporated herein by reference. As a result of the foregoing offenses, Defendants DONTEZE CONGRESS and THOMAS J.D. WILLIAMS shall forfeit to the United States any and all firearms and ammunition involved in or used in the commission of the violations charged in Counts 1 through 10; including, but not limited to, the following: a Glock model 26 9mm semiautomatic pistol, bearing serial number BBXS405, and ammunition.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.